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July 1, 2019

Hon. Paul G. Gardephe, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, N.Y. 10007

**Re: *Rashad Rogers v. City of New York, et al.***  
**Docket No. 1:15 CIV 0385 (PGG)**

Dear Honorable Judge Gardephe:

I am counsel to Rimland & Associates, the attorney for the Plaintiff in the above referenced case. I am writing to advise the Court as to the status of this case and to request a four month extension of time for the parties to conclude discovery, to November 1, 2019. The had previously extended the parties time for a limited discovery regarding the Plaintiff's deposition and other information with the potential that the parties may be able to settle the case. This is a joint request by all counsel.

The deposition of the Plaintiff was conducted on June 3, 2019, which was followed by additional discussions by counsel. Unfortunately, the parties do not believe we can reach a settlement at this stage. Based on the foregoing, the parties are jointly requesting the Court to provide an additional four (4) months through November 1, 2019 to complete discovery.

In addition, the parties have jointly encountered difficulties in obtaining my client's educational records. As of the date of this writing, the Department of Education for the City of New York is still attempting to locate and produce such records should they exist, but have not provided a time-frame by which they will do so. In fact, it is for this reason the Plaintiff is submitting the attached Supoena *Duces Tecum* in order to obtain his medical, psychological/psychiatric and other records from the New York City Department of Education (these documents have been requested by the Plaintiff's expert psychiatrist.

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Both counsel are available after July 15, 2015 should the Court wish to further conference this matter. Thank you for your consideration of the within matter.

Respectfully submitted,  
Rimland & Associates

  
By: Matthew A. Kaufman [MK 0598]

MAK  
encl.

cc: Joshua A. Weiner, ACC [via Efile]